

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

RED BARN MOTORS, INC.)	CASE NO. 1:14-cv-01589-TWP-DKL
BARBARA A. RICHARDSON)	
and DONALD B. RICHARDSON)	
)	
Plaintiffs,)	
)	
vs.)	
)	
LOUISIANA'S FIRST CHOICE)	
AUTO AUCTION, L.L.C. and)	
NEXTGEAR CAPITAL, INC.,)	
)	
Defendants.)	

INITIAL DISCLOSURES OF DEFENDANT

Pursuant to Fed. R. Civ. P. 26(a)(1)(A) and the Court's Docket Entry of October 9, 2015 [Dkt. 62], Defendant, NextGear Capital, Inc., by counsel, provides the following Initial Disclosures, based on information reasonably known at this time:

A. Persons Likely To Have Discoverable Information That Defendant May Use To Support its Claims:

1. Barbara Richardson
2. Donald Richardson

B. Description of Documents Defendant May Use To Support Its Claims.

1. Loan documents executed on behalf of Red Barn Motors, Inc.
2. Account statements, including such reports as the receivables detailed report, showing account activity.

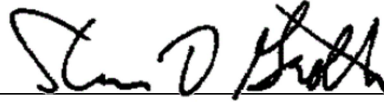
C. Damages: N/A

D. Any Insurance Agreement that May Satisfy Part or All of any Judgment:

None.

Defendants reserve the right to supplement these disclosures as additional information becomes available.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon the following counsel of record via first class, United States mail, postage prepaid, this 13th day of November, 2015:

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